



JONATHAN M. HERMAN
Partner & Co-Chair of Commercial Litigation Practice Group
(212) 415-9247
FAX (646) 607-0943
herman.jonathan@dorsey.com

VIA ECF

June 21, 2018

The Hon. Roslynn R. Mauskopf
U.S. District Court Judge, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Wexler v. Dorsey & Whitney LLP, 1:18-cv-3066 (RRM)

Dear Judge Mauskopf:

We are counsel for defendants Dorsey & Whitney LLP and Artin Betpera in the above-referenced litigation, having filed notices of appearance yesterday. We had at this time intended to file a letter pursuant to Rule III.A.2 of Your Honor's Individual Rules of Practice to request (1) a pre-motion conference in advance of defendants' anticipated motion to dismiss the Complaint or in the alternative for summary judgment, and (2) an extension of the June 25, 2018 deadline for defendants to answer or otherwise respond to the Complaint until two weeks after the date scheduled for the pre-hearing conference. However, in light of plaintiff's letter of June 18, 2018 to Your Honor (Dkt. #5), in which plaintiff indicated he intends to amend his Complaint and requested an extension until July 9, 2018 to file an Amended Complaint, it seems to us it would be futile at this time to file a letter requesting a pre-motion conference and outlining all of the reasons why the plaintiff's initial Complaint should be dismissed. As of the writing of this letter, plaintiff's request for an extension until July 9, 2018 has not yet been granted or denied. Given the upcoming June 25, 2018 deadline for defendants to respond to the Complaint, we respectfully request a brief extension of time to file our pre-motion letter until July 16, 2018 (assuming plaintiff's request for an extension is granted). We have conferred with Mr. Wexler, and he has consented to this request.

Respectfully,

/s/ Jonathan M. Herman

cc: Shimshon Wexler, Esq.
Krista E. Bolles, Esq.